

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

BERNARD J. EBBERS,

Defendant.

NOTICE OF MOTION

S4 02 Cr. 1144 (BJS)

PLEASE TAKE NOTICE that upon the Declaration of David B. Anders, dated June 7, 2005, upon the accompanying memorandum of law, and upon all prior proceedings herein, the United States Attorney for the Southern District of New York will move this Court before the Honorable Barbara S. Jones, United States District Judge, United States Courthouse, 40 Centre Street, New York, New York 10007, as soon as counsel can be heard, for an order designating this case as a case with “multiple crime victims” pursuant to Title 18, United States Code, Section 3771 (d)(2), and approving certain victim notification procedures as “reasonable” under that Section as well, and for such other relief as is just and proper.

Dated: New York, New York
June 7, 2005

Respectfully submitted,

DAVID N. KELLEY
United States Attorney

By: _____
David B. Anders
Assistant U.S. Attorney
(212) 637-1029